

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION

UNITED STATES OF AMERICA

VERSUS

CRIMINAL NO. 2:16-cr7-KS-MTP

CHARLES BOLTON and LINDA BOLTON

**MOTION FOR PERMISSION FOR FILING UNDER SEAL**

Joe Sam Owen ("Owen"), Ben F. Galloway ("Galloway") and the firm of Owen, Galloway & Myers, PLLC ("OGM") move this Court for Permission to File Under Seal , to-wit:

I.

The sentencing of Bolton concluded on March 17, 2017. Owen, Galloway and OGM will seek to withdraw as attorneys of record for Bolton. Due to certain matters discussed during an in camera sentencing hearing and matters discussed during the open court sentencing, Owen and Galloway seek to add as part of the sentencing record certain documents from the Bolton file maintained by OGM. Owen and Galloway have filed a Motion to Deem the Privilege Waived but the Motion is still pending. As a result of confidentiality issues, the OGM Bolton documents must be filed under seal.

II.

The OGM Bolton documents will be filed under seal through a separate submission pleading.

WHEREFORE, PREMISES CONSIDERED, Joe Sam Owen, Ben F. Galloway and the law firm of Owen, Galloway & Myers, P.L.L.C. move this Court for Permission to File Under Seal certain documents from the Bolton criminal file maintained by Owen, Galloway and OGM relating to the representation of Charles Bolton in the above-styled matter and in an unrelated 2014 criminal investigation.

Respectfully submitted this 20<sup>th</sup> day of March, 2017.

/s/: JOE SAM OWEN

/s/: BEN F. GALLOWAY

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CERTIFICATE OF SERVICE

I, JOE SAM OWEN, of the law firm of Owen, Galloway & Myers, PLLC, do hereby certify that I have this date electronically filed the above and foregoing MOTION FOR PERMISSION FOR FILING UNDER SEAL with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

SO CERTIFIED THIS 20<sup>th</sup> of March, 2017.

/s/ JOE SAM OWEN

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